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September 28, 2022

VIA ECF

Hon. Sarah L. Cave United States District Court Daniel Patrick Moynihan United States Courthouse Southern District of New York 500 Pearl Street, Room 1670 New York, NY 10007-1312

Re: Consent Letter-Motion for Extension of Time for the Parties to File Joint Letter in Flynn et al v. Cable News Network, Inc., No. 1:21-cv-02587-GHW-SLC (S.D.N.Y.)

Dear Magistrate Judge Cave:

We represent Cable News Network, Inc. ("CNN") in the above-captioned matter. On behalf of the parties, we respectfully request an extension of the parties' deadline to file a joint letter advising the Court (i) whether the parties are interested in a settlement conference, and (ii) the status of discovery (ECF No. 70) from October 3, 2022 to October 7, 2022. The parties intend to meet and confer on Friday, September 30, 2022, and therefore would benefit from additional time prior to completing the joint letter. Counsel for Plaintiffs has consented to this request.

The parties have not previously requested an extension of time in connection with this joint letter. Thank you for the Court's consideration of this request.

Respectfully submitted,

/s/ Katherine M. Bolger

Katherine M. Bolger Davis Wright Tremaine LLP